

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC,
PATENT LITIGATION

)
) Case No. 2:22-md-03042-JRG
)

**THIS DOCUMENT RELATES TO CASE
NO. 2:23-cv-00113-JRG**

) **JURY TRIAL DEMANDED**
)
)
)

TAASERA LICENSING LLC,

)
) Case No. 2:23-cv-00113-JRG
)

Plaintiff,

) **JURY TRIAL DEMANDED**
)

v.

PALO ALTO NETWORKS, INC.,

)

Defendant.

)
)
)

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Taasera Licensing LLC (“Plaintiff” or “Taasera”) and Defendant Palo Alto Networks, Inc. (“Defendant” or “PAN”) (collectively, the “Parties”) hereby file this Joint Motion to Stay All Deadlines and Notice of Settlement.

All matters in controversy between the Parties have been settled in principle. The Parties respectfully request a stay of all case deadlines for thirty-five (35) days while the Parties finalize a settlement agreement and file dismissal documents with the Court.

WHEREFORE, the Parties respectfully request that the Court enter the proposed order submitted with this motion as set forth above.

Dated: November 28, 2023

Respectfully submitted,

/s/ Alfred R. Fabricant

Alfred R. Fabricant

NY Bar No. 2219392

Email: ffabricant@fabricantllp.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue,

Suite 206 South

Rye, New York 10580

Telephone: (212) 257-5797

Facsimile: (212) 257-5796

Samuel F. Baxter

State Bar No. 01938000

sbaxter@mckoolsmith.com

Jennifer L. Truelove

State Bar No. 24012906

Email: jtruelove@mckoolsmith.com

MCKOOL SMITH, P.C.

104 E. Houston Street, Suite 300

Marshall, Texas 75670

Telephone: (903) 923-9000

Facsimile: (903) 923-9099

ATTORNEYS FOR PLAINTIFF

TAASERA LICENSING LLC

/s/ Michael R. Rueckheim (with Permission)

Kelly C. Hunsaker

Email: KHunsaker@winston.com

Michael R. Rueckheim

(State Bar No. 24081129)

Email: MRueckheim@winston.com

Eimeric Reig-Plessis

Email: EReigPlessis@winston.com

WINSTON & STRAWN LLP

255 Shoreline Drive, Suite 520
Redwood City, CA 94065
Telephone: (650) 858-6500
Facsimile: (650) 858-6550

Krishnan Padmanabhan
Email: KPadmanabhan@winston.com
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166-4193
Telephone: (212) 294-6700
Facsimile: (212) 294-4700

Melissa R. Smith
(State Bar No. 24001351)
Email: melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 S. Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

**ATTORNEYS FOR DEFENDANT
PALO ALTO NETWORKS, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on November 28, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant

Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel of record have met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Alfred R. Fabricant

Alfred R. Fabricant